

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SHARON DENISE DARNELL,

Plaintiff,

v.

Case No.: 3:24-cv-01211

LEXISNEXIS,

Defendant.

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**DEFENDANT LEXISNEXIS RISK SOLUTIONS INC.'S NOTICE OF  
REMOVAL**

Defendant LexisNexis Risk Solutions Inc. (“LNRS”),<sup>1</sup> by and through undersigned counsel, hereby files this Notice of Removal of this action from the Dallas County Justice of the Peace Court 4-2, where it is now pending as Case No. JPC-24-01370-42 (the “Civil Action”) to the United States District Court for the Northern District of Texas, Dallas Division. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441 and 1446. In support hereof, LNRS shows the Court as follows:

1. On or about April 29, 2024, Plaintiff Sharon Denise Darnell (“Plaintiff”) filed her Complaint in the Civil Action. Copies of the Civil Action docket as well as all process, pleadings and orders in the Civil Action are attached to this Notice of Removal as Exhibit A.
2. The Summons and Complaint in the Civil Action were served on LNRS on May 6, 2024. Therefore, this Notice of Removal is filed within the time prescribed by 28 U.S.C. § 1446(b)(1).

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<sup>1</sup> Plaintiff names “LexisNexis” as the Defendant, which is not a legal entity. Upon information and belief, the proper entity may be LexisNexis Risk Solutions Inc. LNRS reserves all rights to later challenge Plaintiff’s identification of a non-legal entity as the Defendant.

3. Plaintiff's Complaint involves claims arising under the Fair Credit Reporting Act, 15 U.S.C. § 1681, *et seq.* See Exhibit A. Thus, the Civil Action is one over which this Court has original jurisdiction under 28 U.S.C. § 1331, and which is removable by LNRS under the provisions of 28 U.S.C. § 1441 in that the matter arises under this Court's original jurisdiction and is founded on a claim or right arising under the Constitution, treaties, or laws of the United States and is removable without regard to citizenship or residence of the parties.

4. LNRS is the only Defendant in the Civil Action. Accordingly, each Defendant to the claims over which this Court has original jurisdiction under 28 U.S.C. § 1331 has joined in the removal of the Civil Action.

5. No proceedings have occurred in the Civil Action as of the date of this Notice of Removal. LNRS has not filed a response to the Complaint. LNRS hereby reserves any and all rights to assert any and all defenses and/or objections to the Complaint. LNRS further reserves the right to amend or supplement this Notice of Removal.

6. Venue for this case lies in the United States District Court for the Northern District of Texas, Dallas Division, pursuant to 28 U.S.C. § 1441(a), because the Civil Action was filed within this District and Division and the case is being removed from Dallas County, Texas.

7. Pursuant to 28 U.S.C. §1446(a), copies of all process, pleadings, orders and other papers filed in this action and obtained by Defendant are attached hereto and marked as composite Exhibit A and incorporated herein by reference.

8. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal will promptly be filed with the Dallas County Justice of the Peace Court 4-2 and be served on all adverse parties.

For the reasons stated above, this Civil Action is properly removed to this Court.

Dated this 20th day of May 2024.

Respectfully submitted,

**MARTIN GOLDEN LYONS  
WATTS MORGAN PLLC**

*/s/ Xerxes Martin*

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*Attorney for Defendant  
LexisNexis Risk Solutions Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of May 2024, a true and correct copy of the foregoing was filed electronically via the Court's CM/ECF system, and was sent via U.S. Mail and Email to the following:

Sharon Denise Darnell  
901 E. Campbell Rd.  
Richardson, TX 75081  
Email: [darnellsharon3@gmail.com](mailto:darnellsharon3@gmail.com)

*/s/Xerxes Martin*  
Eugene Xerxes Martin, IV